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RESPONSE TO CONSULTATION ON A NEW FUEL POVERTY STRATEGY FOR NORTHERN IRELAND

Caitlin McIlhennon and Vanessa Conroy

EJNI
ENVIRONMENTAL JUSTICE
NETWORK IRELAND

●● feminist communities
●■ for climate justice

EJNI and Feminist Communities for Climate Justice: Joint Response to Consultation on a new Fuel Poverty Strategy for Northern Ireland

1. Do you agree with the proposed vision and guiding principles?

To support the proposed vision of "A warm, healthy home for everyone" the following guiding principles are proposed –

- *Long-term sustainable solutions – ensure people are lifted out of fuel poverty by focusing on long-term solutions rather than short term focuses, aligning our duties under the Climate Change Act (NI) 2022, including those relating to the Just Transition principle and its connected objectives*

Yes

- *Needs-based – respond to the changing needs of people in or at risk of fuel poverty by providing more flexible, holistic support that prioritises those most in need*

Yes

- *Collaborative – building partnerships, referral networks and collaboration across all sectors of society will be at the heart of everything we do*

Yes

- *Participative – empowering people and communities to seek long-term solutions, recognising and removing barriers, and enhancing the capacity and confidence of fuel poor to seek support.*

Yes

2. Do you agree with the timeframe and review period?

We propose that the strategy focus on a ten-year period to 2035, with a review in 2030.

Yes, but this should include annual progress reports that should be reviewed by both the prospective Just Transition Commission and a Fuel Advisory Poverty Group. Any delays in meeting targets set out in the Fuel Poverty Strategy should trigger automatic reviews to prevent prolonged hardship, particularly for vulnerable groups.

3. What would a readily understandable and measurable definition of "thermal comfort" look like?

As identified in the supporting consultation documents "thermal comfort" should be measured by the level of effective insulation, efficient heating, tenant warmth, comfort and indoor air quality. However, in addition "thermal comfort" should be measured by the ability to secure materially and socially necessitated energy services.

Energy poverty stands for a household's lack of access to essential energy services, impacting their ability to maintain a decent standard of living and health, and it is driven by factors such as non-affordability, insufficient disposable income, high energy expenditure, and poor energy efficiency of homes.¹ All of the above factors should be considered to define "thermal comfort". While identity-based analysis is important when tackling energy poverty, no matter the makeup of the household (elderly, children etc) your health should not be impacted by the quality of your housing and ability to heat your home.

¹ National Women's Council, *Feminist Climate Justice: A Future Beyond Crisis* (2022)
https://www.nwci.ie/images/uploads/NWC_CWI_FeministClimateJusticeReport_Web_%28compressed%29.pdf

4. For a Minimum Energy Efficiency Standard (MEES) in the Private Rented Sector (PRS) to effectively alleviate fuel poverty, what information or data do you think would be useful and what barriers would we need to overcome?

Minimum Energy Efficiency Standards (MEES) will require private sector landlords to comply with energy efficiency standards, which the Department for Communities will introduce by 2027.

Under its *Housing for All* policy, the Republic of Ireland proposed implementing Minimum Energy Efficiency Standards (MEES) for private sector landlords by 2025.² Under these regulations, rental properties would be required to meet a minimum Building Energy Rating (BER) to improve energy efficiency and reduce carbon emissions in order to be rented out. The proposed minimum BER rating mandated is 'D' or higher, aligning with the government's commitment to enhancing the quality of rental housing. This initiative aims to ensure that tenants benefit from better-insulated homes, leading to reduced energy costs and increased comfort. Landlords are encouraged to undertake necessary retrofitting measures to comply with these standards and contribute to national energy efficiency goals. However, this measure remains to be implemented and important lessons can be learned by the ways in which the Irish government attempts to encourage uptake from private landlords, with the government's current [Climate Action Plan \(2024\)](#) still acknowledging that there is low incentives for landlords and a 'split incentive' between tenants and landlords in this area. Tax deductions (€10,000) are made available for landlords who undertake energy efficiency upgrades whilst their tenant remains in situ. Therefore, it is imperative that the government adhere to the 2027 timeline indicated especially within the context that the government has already [failed to meet statutory timelines](#) for the introduction of carbon budgets among other obligations as prescribed by Northern Ireland's Climate Act.

A clear barrier to overcome is the lack of will from landlords, in Northern Ireland only 5-8% of landlords took up the 50% government funding allowance as part of the affordable warmth scheme. The Government should look to international best practice on the introduction and implementation of MEES in the Private Rented Sector. The Irish Government has put in place several supports for landlords to help overcome this barrier including a range of grants, a tax incentive, and the forthcoming home energy upgrade loan scheme, these measures should be explored as options in the North. In order to address the extent and nature of energy poverty that many private sectors tenants experience, property owners themselves must be encouraged, enabled, and to a certain degree obliged, to engage with home energy upgrade schemes.³ As with all other issues involved in the tenant-landlord scenario, there is a need for a practical carrot and stick approach. Since reluctance to take on upfront costs is likely to act as a barrier for many property owners, one possibility worth exploring would be the provision of fully or substantially funded energy upgrade grants for all private property owners without means testing, but with the caveat that the property must be kept on the rental market for at least ten years after availing of the retrofit scheme.⁴

The introduction of a MEES calls for a separate consultation to assess risk to tenants, a 'whole of house' retrofit approach (WHR) could seriously affect the security of tenure of tenants. Therefore, data and information that would be useful ahead of the 2027 target would be a risk assessment of tenants in the rented sector. While replacing fossil fuel energy as the main source of energy in households is important in meeting national energy efficiency goals and climate targets, it is more important to initially insulate the

² Government of Ireland, *Housing for All: A New Housing Plan for Ireland* (2 September 2021) <https://www.gov.ie/en/publication/ef5ec-housing-for-all-a-new-housing-plan-for-ireland/>

³ Citizens Information Board, *Submission on the Energy Poverty Action Plan* (2024) https://www.citizensinformationboard.ie/downloads/social_policy/submissions2024/energy-poverty-action-plan-citizens-information-board.docx

⁴ Ibid.

homes. Unaffordable rental costs and lack of security of tenure in the private rental sector may generate and exacerbate energy poverty.

Scepticism acts as another barrier to the introduction of measures that address energy inefficiency and fuel poverty. The government should coordinate an online open questionnaire targeting focus groups such as vulnerable communities, marginalised groups to capture the effects of energy poverty and equally capture the people that are sceptical of measures or are reluctant (e.g. landlords) to take measures that would meet a MEES. Tenants may also wish to opt out of WHR works due the scale and/or intrusiveness of the works planned.

The introduction of MEES should align with the UK government's anticipated consultation on [Minimum Energy Efficiency Standards for all rented homes by 2030](#). The NI government may also want to mirror the [Local Heat and Energy Efficiency Strategy and Delivery Plans](#) in Scotland to provide a more place-based approach to heat and energy efficiency planning and delivery. LHEES set out a long-term plan for decarbonising heat in buildings and improving their energy efficiency across an entire local authority area. In regard to data, this could provide an evidence base for what interventions are needed to decarbonise Northern Ireland's buildings and tackle poor energy efficiency as a driver of fuel poverty, especially considering that due to differences in sub-national market structures between NI and Great Britain gas and electricity consumption data are not available specifically for NI. In addition, the NI fuel poverty statistics are calculated based on NIHCS data by BRE Group. However, the methodology is insufficient and lacks transparency to determine how these data shortages are overcome.

5. Should MEES also be applied to other tenures?

Yes. Consistency in standards of both the private rented sector and homeowners would be more useful in terms of data collection that would indicate a more accurate picture on progress in meeting national energy efficiency and climate targets.

6. Do you agree that introducing updated fitness standards will contribute to making homes more energy efficient?

Yes. The current fitness standards as set out in Article 46 of the Housing (NI) order 1981 are outdated. The fitness standards should be amended to mandate and include a Minimum Energy Efficiency Standard and therefore the provision of an Energy Rating Certificate for private rented homes. Updating standards could include higher insulation requirements and more energy efficient heating systems that will lower energy consumption.

7. Do you agree that all government domestic energy schemes should take account of Fuel Poverty Strategy principles?

Yes.

8. Do you agree that DfC should take a more flexible approach that considers current data when setting and reviewing:

(i) Income thresholds: Yes

(ii) Eligibility criteria: Yes

For fuel poverty measurement in NI, the 10% Fuel Poverty indicator is used, that is households are considered fuel poor if they spend more than 10% of their income on heating and electricity after deducting housing costs etc. However, it is important to capture the multidimensional nature of energy

poverty beyond solely income thresholds. There are experiences of energy poverty that are not accurately captured by existing methodology which intersect with existing deprivation and social exclusion. For example, what if you are £5 over the income threshold? There should be other criteria in place to ensure that applicants who do not meet the income threshold but are experiencing energy poverty or health issues from poor quality housing are not exempt from support. Therefore, a flexible approach to both the income threshold and the eligibility criteria is essential. Groups that are more vulnerable to experiencing energy poverty in addition to those living with low incomes include women, disabled people, migrants, people seeking refuge and asylum, travellers and lone parents. An identity-based analysis should factor into the eligibility criteria. Barriers to accessing sufficient energy levels for these groups go beyond merely income-based issues, and some aspects of their energy use cannot be accurately captured by an all-of-household unit of measurement with all energy use tied to income.

For example, the cultural and gendered associations that see women carrying out most caring work in the home has implications for gendered vulnerability to energy poverty. Both exclusion from the economy and unpaid caring or domestic roles have impacts on energy use and vulnerability to energy poverty for women, therefore it is imperative to connect energy poverty to wider income and material poverty associated with gender inequality as opposed to solely income related barriers.

Case Study:

Scotland's current strategic investment approach for retrofitting low rise blocks is to target investment in areas that fall within the 20% most deprived areas as per the Scottish Index of Multiple Deprivation (SIMD), in line with the climate justice approach. For example, it is calculated using seven domains:

1. **Income** - Measures the proportion of people with low income.
2. **Employment** - Looks at unemployment rates and work-related benefits.
3. **Health** - Considers illness, hospital stays, and early deaths.
4. **Education** - Includes school performance, absenteeism, and adult qualifications.
5. **Access to Services** - Measures proximity to essential services like GPs, shops, and public transport.
6. **Crime** - Examines rates of violent crime, drug offenses, and anti-social behavior.
7. **Housing** - Assesses overcrowding and housing quality.

By prioritising investment in the most deprived and socially disadvantaged areas, the retrofit interventions help to target those most at risk of fuel poverty and properties most in need of investment due to their existing fabric and energy performance.

However, this still lacks an identity-based approach, the NI Government should combine the approach of the SIMD and an identity-based analysis when setting and reviewing the eligibility criteria. In the Republic of Ireland, Citizens Information Board demonstrated in their [response](#) to the Department of the Environment, Climate and Communications Survey on the Revised Energy Poverty Action Plan that some groups of people are more vulnerable to energy poverty than others, including:

- People living in older build houses
- People living in rental accommodation
- Traveller communities
- Older people
- People living in low-income households
- People who are over-indebted
- Lone-parent families
- Disabled people

Many in these groups may already be at a social disadvantage and are likely to be living in houses with low energy efficiency or unable to keep up with rising energy prices or rent. It is important that any measures taken to combat energy poverty or to support households to move away from fossil fuels take the needs and experiences of these groups into account. For example, the additional heating costs associated with some types of disability are significant and need to be fully acknowledged and addressed from a social inclusion perspective.

9. To mitigate increases in the cost of living, do you agree that an income threshold should increase in line with:

- (i) Minimum wage levels: Yes
- (ii) Inflation: Yes
- (iii) Another index, e.g. RPI: Yes
- (iv) Other - please specify

However, methodology used to assess income e.g. the amount spent on household energy, is insufficient for capturing the multi-dimensional nature of poverty. It is important not to assume that all energy use in the household is directly tied to income. Energy consumption for homes often represents a significant portion of households' income and are linked to energy vectors with prices that can significantly and simultaneously impact household energy consumption and affordability; this issue needs to be considered within a Just Transitions framework.

10. Should the Energy Performance Certificate (EPC) rating of a house be considered as part of eligibility criteria (i.e. the least energy efficient homes are considered first?)

Yes. It is important that in using area-based schemes, households in energy poverty that live in the least energy efficient properties are prioritised. EPC regulations offer a rating system to give tenants and consumers better information on the energy efficiency of their property and on the emissions and efficiency of its heating system, which will also support mandatory MEES.

To reiterate, it is imperative that when considering the least energy efficient homes first that the fuel poverty strategy address insulation (i.e., reducing heat loss, removing thermal bridges/cold posts and reducing the build-up of moisture) as the priority issue before installing energy efficient sources of heating such as heat pumps etc. "*Fabric first*" is essential and should be prioritised ahead of decarbonisation measures.

11. Do you agree that the new scheme should continue with the Whole House Retrofit approach?

It is important to review best practice examples of where this has been done already. The [Scottish government's Heat in Buildings Strategy](#) aims to achieve net zero emissions in Scotland's buildings by 2045 including whole-house retrofits to improve energy efficiency and reduce emissions. For example, the Edinburgh council was one of the first local authorities in Scotland to pilot a WHR approach. Improving the fabric of buildings and energy performance, lowering tenants' fuel costs and supporting the city's net zero carbon by 2030 commitment. DAERA should coordinate with its counterpart in Scotland to see how the WHR approach can be applied in a fair and just way. Equally, such an approach should ensure all elements such as insulation and zero/low carbon heating solutions complement one another rather than working against one another.

A holistic WHR approach should be centred on fabric first to reduce existing energy demand and heat loss. This approach provides the biggest impact in terms of carbon and energy demand reduction. A follow up strategy for the decarbonisation of existing heating systems across homes will need to be developed, reviewed by the Fuel Poverty Advisory Group, NI's Just Transition Commission and put forward for consultation. Measures that use zero direct emissions heating systems result in added costs of removing gas boilers and replacing them with ZDEH systems which additionally causes major disruptions to tenants in having to remove and replace existing internal pipework/ radiators. Scotland's [Housing, Homelessness and Fair Work Committee](#) found that focusing on an insulation or "fabric first" approach reduces existing heating demand from between 50%-75%. This type of intervention will also support the move to ZDEH systems at a later date and not significantly increase tenants' energy bills in the interim. In addition, a [study](#) found that to alleviate energy poverty in NI the mean cost to retrofit energy poor dwellings ranges from £2,143 depending on the dwelling type. Furthermore, research using a Retrofit Debt Burden Indicator, taking the analogy of the 10% fuel poverty indicator: i.e., a household incurs a significant energy related debt burden if its annualised cost of retrofit debt exceeds 10% of its income after the deduction of housing costs and other essential items. Using this indicator illustrates that in Northern Ireland retrofitting may improve the "thermal comfort" of a dwelling but not necessarily the household's financial situation - up to 3.5% of residents of each dwelling type will find the consequent debt burden causes significant financial stress, especially those most vulnerable.

Important data to gather would be an integrated impact assessment for the planned WHR programme. This will help to highlight any equality, human rights (including children's rights) and socio-economic disadvantage implications for members.

The interventions required to enable a whole house retrofit approach can often lead to other measures being required such as changes to the existing fire strategy (i.e., Automatic Opening Vents and firefighting lifts needing to be installed in some cases). As such, investment costs could increase along with the timeframe for delivery. The additional range of potential health and safety interventions will vary quite significantly. In terms of community impact as part of the WHR programme, a detailed communication plan should be created to ensure tenants and homeowners are given an opportunity to discuss the planned retrofit to review proposals and ensure their voice and views are heard, captured and fed into the WHR process.

It is important to address energy poverty and housing justice challenges in tandem through a range of targeted measures including a strong and expansive National Retrofit Plan, targeting energy poverty in rural homes by setting up a dedicated retrofitting programme for households solely relying on solid fuel heating systems, adopting rent affordability and enforcement mechanisms to ensure that housing costs do not undermine a household's capacity to meet its energy needs.

Ensure that the policy design and finance options of retrofitting are sufficiently tailored to the needs of low-income households, tenants, rural dwellers, and the traveller community. Provide grants to the worst-performing homes in the private rental sector, which avoids the "split-incentives" issue between landlords and tenants. To avoid "renovictions" (i.e. an eviction which is carried out to retrofit a rental unit) long-term leases and rent-control must be mandatory. A tailored retrofit plan for the private rental sector should contain clear milestones, targets and funding.⁵

⁵ Community Law and Mediation, *Submission to the Department of Environment, Climate and Communications on a New Energy Poverty Action Plan* (2024) <https://communitylawandmediation.ie/change/submission-to-the-department-of-environment-climate-and-communications-on-a-new-energy-poverty-action-plan/>

12.If the Whole House approach is used, do you agree that all recommended measures must be installed unless there are exceptional reasons not to?

We do not agree with the Whole House Approach as highlighted previously it could lead to "renovictions" and risk to security of tenure. There remains the issue of scepticism, and the department is at risk of backlash if it implements WHR approach without first securing buy-in and engagement from a range of actors including vulnerable groups.

For a small minority of dwellings, less than 2.5% of each dwelling type, the annualised costs of retrofit exceed their fuel burden, and so retrofitting is not an appropriate measure. It is imperative that government support is provided in these instances for the alleviation of fuel poverty and meeting energy efficiency targets.

13.Do you agree that the new scheme should prioritise low carbon heating solutions where possible?

The government must consider actions which could be taken to decarbonise heat / energy sources within homes, for example, by preparing homes to be ready to connect to alternative, zero carbon energy sources in the future. However, improving heating systems with a focus on zero emissions should not be at the expense of security of tenure for tenants. There may be resistance and a lack of readiness on the part of the community to accept new ways of producing, storing, distributing and using energy. Community and neighbourhood scale initiatives are likely to achieve greater acceptance and adoption, particularly if local people are involved in the decision-making and ownership structures.⁶ Options that are likely to be attractive for individuals and local communities would be those that would clearly reduce energy costs for their own households and enable them to feed self- or community-generated or stored energy into the national grid. Local authorities and community-based NGOs have the potential to play a crucial role in demonstrating the feasibility, benefits, and advantages of new approaches to energy creation and usage, by providing leadership, examples of best practice and commitment, as well as by mobilising action at a local level. The strengths and influence of community-level organisations should not be underestimated. By their actions, example and voices, this level of mobilisation has the power to influence, guide and assist households into making more sustainable and financially rewarding choices.⁷

14.Do you agree that the new scheme should offer renewable technologies such as solar panels and battery storage to offset the running costs of low carbon heating solutions in low-income households?

Yes. However, to be able to answer this question properly we need more data/ research on how this tackles energy poverty directly. Modelling for assessing some solutions to energy poverty such as the addition of Solar PV to the roofs of social housing in Spain has been conducted, but the main drawbacks of such studies is that energy poverty alleviation is not explicitly quantified.

Smart energy solutions involving a range of approaches and technologies will only succeed if people are convinced that these solutions will bring clear benefits and would save money for their households. Clear and well-structured delivery of information as well as effective signposting will be essential in the promotion of smart energy solutions. Continued attention will need to be made in assessing and

⁶ Citizens Information Board, *Submission on the Energy Poverty Action Plan* (2024)

https://www.citizensinformationboard.ie/downloads/social_policy/submissions2024/energy-poverty-action-plan-citizens-information-board.docx

⁷ Ibid.

simplifying the various grants application processes. There is clearly a need for additional grant assistance for smart energy and related retrofitting to be specifically targeted at low- income households.

15. Do you agree that rural properties should be prioritised for energy efficiency support?

No. We do not agree, not because we don't see the additional challenges for rural households, but because 'rural households' as a category doesn't tell us anything about EPC, experience of energy poverty income levels, access to resources, household makeup, chronic illness etc. Government should focus on those most in need regardless of where they live and should also create a bespoke energy efficiency support plan to address the additional challenges presented by making households in rural areas more energy efficient. For e.g. many rural households continue to rely on oil-fired systems or solid fuel stoves for heating. In order to meet the needs of these households over the winter months, and, pending the provision of better supports for retrofitting, there is a need for a more targeted approach which takes into account the location and physical structure of houses.

16. Do you agree with a sliding scale approach to funding for home energy schemes?

Yes, a sliding scale approach ensures that funding is distributed according to need. Energy companies should contribute proportionally to these schemes to ensure that the most vulnerable households receive the support they need.

17. Do you agree that loans are the fairest financing option for landlords who are required to improve their assets?

No, grants or shared funding models are preferable to loans. This would remove financial barriers and incentivise landlords to improve their properties, ensuring that energy efficiency measures are accessible to all.

Case Study:

In Scotland, Scottish Government funding is used for schemes such as grant and loan schemes provided by Home Energy Scotland and council area based schemes to reduce fuel poverty by enabling local authorities to design and deliver energy efficiency programmes in fuel poor areas. Other support includes SME Loans and cashback and the Scottish Green Public Sector Estate Decarbonisation Scheme.

The Scottish Government has allocated £1.3 billion of funding through the Heat in Buildings schemes so far this Parliamentary Session (excluding 25/26), spending over £575 million on energy efficiency and clean heating projects. The draft budget for 2025-26 has allocated £349 million for energy efficiency and decarbonisation. The Scottish Government has pledged £1.8bn for heat and energy efficiency measures this parliamentary term, whilst estimating that the total investment needed for decarbonising heat will be over £33 billion.

18. Do you agree that we should consider increasing levies from electricity bills to fund energy efficiency schemes for low-income households?

Increasing levies on energy bills, if considered as a viable option to fund energy efficiency schemes for low-income households, should be seen as a last resort source after all other options for sourcing funding have been explored and exhausted.

The consultation documentation proposes that, in the future, better data collection might allow for supports such as Discretionary Support to be targeted to those most in need; it also proposes that certain households, such as those with high-energy usage due to medical equipment use, might be targeted for bill support, or automatically being on the lowest tariff regarding energy billing. The research and data gathered to make such proposals a reality should also be used to ensure that these more vulnerable households are exempt from increased levies on their energy bills.

19. Should we explore introducing levies on gas to increase funding for such energy efficiency measures?

N/A.

20. What are your thoughts on exploring any revenue-raising opportunities for energy efficiency schemes from unregulated heating sources such as home heating oil?

Case Study:

Longer term the Scottish Government has highlighted significant scale of spending required and that the costs cannot be borne by Government alone. It has established the Green Heat Finance Taskforce to *"develop a portfolio of innovative financial solutions for building owners in Scotland to ensure that by 2045, our homes and buildings no longer contribute to climate change, as part of the wider just transition to net zero"*.

21. Do you agree that we should utilise and build referral pathways between Government, local government, health professionals and the Voluntary and Community sector?

If yes, how can we best achieve this?

Yes - Government should look to existing good examples of cross-departmental/organisation referral pathways, such as the Independent Advice and Debt Services Sector and the Family Support Hub, making contact with the organisations involved and learning about the methods and practises used by these organisations in order to make these collaborative referral pathways so successful and highly praised.

Government should also look to existing good practice examples which can be replicated (where possible). One such example is the pilot Warmth and Wellbeing Scheme in the Republic of Ireland, led by the Department of the Environment, Climate and Communications with the Department of Health, the Sustainable Energy Authority of Ireland (SEAI) and the Health Service Executive (HSE). The aim of the initiative was to improve the living conditions of vulnerable people at risk of energy poverty and living with chronic respiratory conditions. The scheme provided free, extensive energy upgrades to eligible homes to make them warmer and healthier to live in. The scheme allowed HSE staff to refer eligible patients (those with respiratory conditions who were at risk of energy poverty, alongside other more specific eligibility criteria) living in the pilot areas directly to SEAI to receive deep energy efficiency improvements to their homes. Over the course of the pilot, 1,672 homes were upgraded in total. An independent analysis validating and objectively measuring the health and wellbeing impacts of the energy upgrades found a direct improvement on participants' physical and mental health from the energy improvements, as well as participants feeling warmer in their homes and being more comfortable inviting others to their homes where they hadn't before.

In Scotland, advisors at the Government-funded Home Energy Scotland offer free, impartial and expert advice on a range of issues including energy efficiency, renewable energy, available grant and loan

funding, alongside other supports. Home Energy Scotland, which is delivered by the Energy Saving Trust, also provide free benefits checks to clients to ensure householders are receiving all the help and support they are entitled to, and can make onward referrals to Scottish Government programmes, Local Authority Area Based Schemes and to CITRUS Energy for advice on switching energy tariffs. Their network of regional advice centres cover all of Scotland, ensuring that locally-based knowledge is accessible.

22. Do you agree with a taskforce/ working group to develop enabling frameworks for energy communities?

Yes, but this taskforce/working group must include representation of communities identified as most vulnerable to fuel poverty to ensure that the barriers - existing and potential - are identified and removed for those most in need. Accessibility to taskforce participation for vulnerable groups must also be considered to ensure full, non-tokenistic participation in framework development.

It is strongly recommended to establish a long-term cross-governmental approach to drive a robust data gathering initiative and in turn use this information to inform policies to alleviate energy poverty. This platform should also allow civil society members, NGOs, academics, and other experts to contribute and engage regularly with the development and implementation of research initiatives. In particular, research should continue to explore in depth the severity of energy poverty being experienced in addition to its existence, from a qualitative research perspective, in order that the effectiveness of policies can be assessed, and that additional support can be targeted appropriately.

23. Do you agree that we should assess the most relevant recommendations of the NICE6 guidelines and consider their implementation?

Yes - not only consider, but actively implement these recommendations.

24. Do you agree that we should work with organisations that provide emergency support to seek a consistent approach across Northern Ireland and the inclusion of a referral to a long-term solution?

If so, what would be the best way to achieve this?

Yes - as previously stated, Government should look to existing good examples of cross-departmental/organisation referral pathways that provide emergency support both at home and abroad.

25. Do you agree with the proposal to prioritise Discretionary Support to provide emergency financial support if there is a future energy or cost of living crisis, until we have better data to target large scale payments?

As there is an existing means assessment for receiving Discretionary Support, this should be used as an initial benchmark for targeting supports in the case of a future energy or cost of living crisis and built upon. This could replicate the somewhat targeted support offered during the cost of living crisis which followed the COVID pandemic - using the benefit system

as a quick and easy way to identify those who needed support. The existing means assessment should be regularly reviewed and updated in line with the current cost of living; developing data around fuel poverty; and as supports for energy efficiency are fully fleshed out and developed.

Universal measures, despite the name, can nonetheless risk leaving out some of the most vulnerable groups and create wastage in government spending. Energy credits which were given out in the Republic of Ireland to alleviate increasing bills in the wake of the Russian invasion of Ukraine - a measure of the first *Energy Poverty Action Plan* and included in the annual Budget - not only went to a number of vacant households, but also failed to reach members of the Traveller community who used shared generators or had energy provided by their local authority. This meant that a group who are particularly vulnerable to fuel poverty missed a vital, 'universal' support. Measures were taken to ensure that the credits given out in the following Budget did not go to vacant households and ensure that communities who were excluded the previous year could better avail of them. Learning should be taken from this example to ensure that, should universal measures be necessary, that spending wastage is minimised and groups living in unique housing situations or with unique energy provision are not omitted.

26. Do you agree with the proposal to gain a better understanding of the impact of changes to Winter Fuel Payments and introduce additional support where appropriate?

Yes - households who are found to have fallen into fuel poverty or at-risk of falling into fuel poverty through the proposed analysis should be prioritised for energy efficiency schemes alongside potential emergency financial support.

One-off measures, while welcome in the short-term, are insufficient to deal with the complex and multi-faceted reality of energy poverty, including, in particular, the intrinsic link between energy poverty and household income and the wide range of levels of energy efficiency within homes.

27. Do you agree that we should improve our understanding of the impacts of energy decisions on different consumer groups?

Yes - the understanding of impacts of energy decisions should be improved for all consumer groups, but for groups/circumstances already highlighted as more vulnerable to fuel poverty in particular. Some consumer groups/headings which should be better understood include:

Consumers who fall into the existing (income-based) definition of fuel poverty; consumers living in dwellings with poor EPC (where available); consumers living in older households; consumers with high-energy usage due to medical equipment use; consumers living on offshore islands (Rathlin); and consumer households made up of/headed by an identity group noted as more vulnerable to fuel poverty, eg: lone parents, older people, Travellers and/or Roma, disabled people, etc.

28. Do you have suggestions for how we could improve understanding and awareness of existing tools to enable consumers to manage their energy costs?

Public awareness raising campaigns on existing tools (switching tariffs, reducing energy use, etc.) could be issued by government across a wide variety of media to create consumer awareness of such tools. This should include advertisement space on television, radio, newspapers, public billboards and at bus/train stops. Just as it is suggested to work with organisations on issues of emergency support in relation to energy use, government could also work with these organisations and with energy suppliers to create accessible guides helping customers reduce their energy use or switch their tariff.

There are existing good examples of campaigns from national governments and other organisations encouraging reduced energy use. One example is a 30-second advertisement created by the European Commission and the European Football Federation (better known as UEFA) which is broadcast during football matches in European competitions organised by UEFA such as the Champions League, Europa

League and national competitions. The advertisement encourages viewers to, 'Be a fan of saving energy, too.'

Another good example is the state-backed 'Reduce Your Use' campaign in the Republic of Ireland. This campaign encourages customers to reduce their energy use in order to save money on their bills, whilst also flagging available supports for those who may be struggling with affordability.

29. How can we support vulnerable people to ensure they are on the most affordable tariff?

Government should work with energy suppliers to identify vulnerable households - ultimately, an onus should be placed on energy suppliers themselves to extend their lowest tariff to all households that are experiencing difficulty. Additionally, households in arrears can experience greater difficulty in moving to more competitive suppliers and tariffs. Relevant policies related to debt flagging need to be reviewed with a view to allowing and enabling all households to move to lower tariffs for defined periods.

Locally-based centres dedicated to energy-efficiency and addressing fuel poverty, such as the aforementioned Home Energy Scotland, could be used to identify vulnerable people in local communities. These centres could work in partnership with Government and the customer to co-create bespoke bill support measures, including those proposed by the consultation documentation such as an ongoing discount on the unit rate, a commitment to certain customers always being on the lowest tariff, a regular rebate on bills, or some combination of these. This could ensure that only the measures most suitable for the customer would be used, and locally-based centres would allow the building of trusting, local referral partnerships whilst supporting vulnerable people.

Regulate energy pricing - those living in energy poverty may not have bandwidth to "shop around" and change their energy supplier on a regular basis to avail of the most competitive rate.

30. Do you agree that we should explore potential affordability support for populations where energy efficiency measures may not be the right solution?

If so, which population groups?

As previously stated in this submission, measures to address insulation/fabric first should be prioritised for as many households as possible, particularly households where affordability is an issue. Households with terminal illness or that use specialised medical equipment should not be seen as households where such measures are 'not the right solution' - they should be prioritised for such measures where non-invasive/disruptive to the household's inhabitants, and these measures should be fully funded to reflect the vulnerability of these households. Only where measures are overly disruptive or invasive should affordability support be chosen over energy efficiency measures which would ultimately provide longer-term support.

Energy efficiency measures in their current design primarily target homeowners or those who live in traditional households. Groups who live in caravans, mobile homes or trailers, such as members of the Traveller community are often not designed into such measures despite being at higher vulnerability to fuel poverty. Until measures have been designed with such dwellings in mind, affordability support should be explored for the Traveller community.

31. Is further research required to identify gaps in non-price protection for different energy users in Northern Ireland?

- The impact of poor housing conditions on energy inefficiency and fuel poverty.
- Ensuring that carers and those they care for, who often require higher energy use, are properly accounted for in policy decisions.
- Reviewing protections for tenants in the private rented sector, where landlords are often not incentivised to improve energy efficiency.
- Identifying barriers to accessing energy support schemes, particularly for pensioners, carers, and minority ethnic communities.

32.What are your views on whether government should adopt a common quality assurance standard or framework across all energy efficiency and low carbon heat grant schemes?

A common quality assurance standard is necessary to ensure consistency and accountability across schemes. Poorly implemented energy efficiency measures such as substandard insulation, can leave households worse off. Any framework must include robust monitoring, enforcement, and consumer protections to prevent exploitation and ensure that public funds deliver genuine improvements.

33.Do you agree that government should take a common approach to consumer protection across all supported energy efficiency schemes?

Yes, a standardised approach to consumer protection is essential to prevent gaps in support and ensure fairness across schemes. Protections should include clear redress mechanisms, guarantees on work quality, and a requirement for accredited installers. Additionally, greater oversight is needed to ensure that energy efficiency schemes do not disproportionately benefit wealthier households while leaving vulnerable groups behind.

34.Do you have any suggestions about how government could change our use of language to improve buy-in and engagement on fuel poverty?

It is essential that a public engagement strategic framework is developed with the aim of delivering a programme of public awareness raising, education and participation around the multi-dimensional (socio-economic factors) of fuel poverty and its interconnectedness with energy efficiency. Language should reflect urgency, fairness, and collective responsibility. Terms like “energy justice” and “energy fairness” can serve to highlight the inequities and systemic issues in current systems that exacerbate fuel poverty. The language used should invoke empathy and the understanding that ensuring affordable energy is a matter of social equity.

Research and engagement on fuel poverty, in order to deliver necessary insights and direction for policy, needs to be designed and undertaken in a manner that identifies and analyses the socio-economic circumstances of those groups in Northern Ireland that are most at risk of energy poverty.

Access to adequate levels of energy is a precondition to the realisation of many rights, impacting our lives, health and living standards.⁸ It is furthermore essential to social inclusion and is increasingly connected to employment opportunities in NI. It is essential that energy poverty is addressed through a rights-based approach. A rights-based approach clarifies the accountability of government to people, particularly

⁸ Community Law and Mediation, *Submission to the Department of Environment, Climate and Communications on a New Energy Poverty Action Plan* (2024) <https://communitylawandmediation.ie/change/submission-to-the-department-of-environment-climate-and-communications-on-a-new-energy-poverty-action-plan/>

marginalised and vulnerable groups. As energy poverty is a multi-dimensional problem, connected to the housing, cost-of-living, and climate crises, it requires a multi-dimensional response. However, Northern Ireland currently lacks a comprehensive framework to accurately measure, monitor and tackle energy poverty.

35. Do you agree that government should take a basket of indicators approach to measuring and understanding fuel poverty?

Yes.

36. Are the indicators suggested the correct ones?

- Fuel Poverty 10% indicator before housing costs: (Current indicator (Northern Ireland House Condition Survey (HCS)

Yes

- Fuel Poverty 10% indicator after housing costs (HCS):

Yes

- Are you able to pay regular bills, including gas, electricity or oil, without cutting back on essentials? (Family Resources Survey (FRS)):

Yes

- Household energy expenditure relative to all expenditure (ONS Living Costs and Food Survey):

Yes

- Is your home damp-free? (FRS):

Yes

- In cold weather, is your home kept adequately warm? (FRS):

Yes

- Winter mortality - Compare the number of deaths that occur in December - March with the average number of non-winter deaths occurring in the preceding August- November and the following April - July (NISRA):

Yes

- Annual modelling of figures for both extreme and severe fuel poverty (HCS):

Yes

- Annual modelling will continue to assess the impact of each driver on overall fuel poverty levels. (HCS and annual BRE modelling):

Yes

- Link SAP data with income deprivation (HCS):

Yes

- People's awareness and confidence in being able to address their own energy issues (TBC):

Yes

Please provide reasons for your answers:

The suggested indicators are largely correct but need to be refined to include specific measures such as:

- Accessibility of Pension Credit and other benefits: This is critical because many older people and carers frequently miss out on entitlements due to the complexity of the claiming process. It is essential that health and social care agencies actively assist individuals in accessing their rightful benefits and support.
- The proportion of income spent on energy bills: This should reflect the impact of rising energy prices on those with fixed incomes.
- Energy efficiency grant uptake among vulnerable communities These additional measures would help provide a clearer picture of the real-world impact of fuel poverty.

Research analysing the causal and sociodemographic characteristics of those experiencing energy poverty found that low-income individuals, elderly, households with children and/or other dependents, women, ethnic minorities, and people with pre-existing health conditions and disabilities are at higher risk of experiencing energy poverty. It is imperative that when measuring and understanding fuel poverty the NI government uses multiple metrics accompanied with the use of "vulnerability lenses" as opposed to a single means of measurement alone. No one metric or lens is sufficient, and a more holistic approach is required to capture all aspects of the condition (e.g by extending beyond financial dimensions alone). This also applies to the solutions, this consultation has suggested that multiple solutions will be required to tackle fuel poverty, and the solutions must be comprehensive, evidence-based and to address all aspects of energy poverty.

There is value in considering additional factors when measuring and understanding fuel poverty such as: the proportion of particular at-risk/vulnerable households having arrears on utility bills; the proportion of the population living in sub-standard housing; qualitative and quantitative measures of the actual degree, nature, severity and extent of energy poverty as experienced by households – for example, the frequency of households experiencing a need to reduce or ration heating to a level that is below an optimal level or impacts negatively on people's health or well-being; the extent and proportion of households that frequently or regularly self-disconnect from their energy supply.⁹ In addition, using the expenditure method only provides a snapshot at a certain point in time. Whether a household experiences energy poverty can fluctuate depending on the time of year, change in income, and energy prices.

Good quality data is not readily available in NI to identify numbers experiencing consistent poverty or relative poverty, the proportion of people not able to afford to keep their home adequately warm, the proportion with arrears on utility bills; the expenditure on energy as a proportion of total household expenditure; the proportions of households with share of energy expenditure in income more than twice the national median or below half the national median. While the 10% fuel poverty indicator (before and after housing costs) is a useful indicator and a good jumping off point - the aim should be to expand and build on this initial indicator with a basket of indicators.

⁹ Citizens Information Board, *Submission on the Energy Poverty Action Plan* (2024)

https://www.citizensinformationboard.ie/downloads/social_policy/submissions2024/energy-poverty-action-plan-citizens-information-board.docx

37.If you agree with the introduction of an indicator based on energy confidence, agency or awareness, do you have suggestions about what kind of indicator might be most valuable?

An “energy confidence” indicator would be valuable in measuring consumers’ awareness of their energy options, including the ability to navigate energy tariffs, apply for financial support, and access energy efficiency grants. This indicator should also track the proportion of households who successfully access lower-cost energy providers or take advantage of energy-saving measures such as insulation or retrofitting.

38.Do you agree with our proposal that carbon emissions are not used as a fuel poverty indicator?

While the research and engagement should be carried out to provide evidence on the interconnectedness of fuel poverty and energy efficiency, carbon emissions emitted from homes should not act as an indicator of fuel poverty. Fuel poverty should be assessed using a basket of indicators that focus on the vulnerability of the household and the affordability/ accessibility to energy. In addition, low-income households may not have high emissions - using less energy services due to financial burdens. While reducing emissions is essential, it should not come at the expense of addressing fuel poverty. Improving energy efficiency will naturally contribute to reducing carbon emissions, but the immediate focus must be on tackling the health and economic issues associated with cold homes.

39.What is the best way to continue to engage with people experiencing fuel poverty?

Informing people of the support and schemes that are available, many households remain unaware or unclear about their rights and entitlements as consumers or the steps they should take when they find themselves in financial difficulties with energy suppliers. The government should improve engagement with people experiencing fuel poverty by tracking how well vulnerable groups are using support measures, including marginalised groups. Working with trusted community organisations will ensure that all groups have equal access to help and address any specific challenges faced by marginalised communities. Regular surveys, focus groups, and home visits will help gather important information about the experiences of those affected by fuel poverty. Communication should be simple and accessible.

Households who use less energy than they would need or like to use to afford their bills are also a hidden cohort of those living in energy poverty. It is essential therefore that the expenditure method is combined with the “subjective method” when measuring energy poverty. The subjective method relies on self-reported data on ability to keep your home warm, utility arrears, ability to transition to sustainable sources of energy, etc.¹⁰ This will require gathering first-hand views of those living in energy poverty, as they will best understand what is needed to eradicate the problem.

40.Do you agree with the proposal for a Fuel Poverty Advisory Group?

It is imperative that a Fuel Poverty Advisory group contains a diverse membership of both sectoral representatives and voices for our vulnerable groups/communities. This must include having due regard for the benefits of diversity, including on the basis of age, race, religion, disability, family status,

¹⁰ Community Law and Mediation, *Submission to the Department of Environment, Climate and Communications on a New Energy Poverty Action Plan* (2024) <https://communitylawandmediation.ie/change/submission-to-the-department-of-environment-climate-and-communications-on-a-new-energy-poverty-action-plan/>

marital/civil status, sexual orientation, gender and socio-economic status. This group would help provide independent oversight and accountability in the development and implementation of the Fuel Poverty Strategy. The success of NI's Fuel Poverty Strategy should be measured, for example, by the geographic spread of improvements, reductions in demand for emergency-type and hardship fund financial supports; and by data relating to any linkages between energy poverty and poor health. An advisory group should ensure NI's Fuel Poverty Strategy aligns with existing legislation, strategies, targets such as those enshrined in NI's Climate Act and NI's Anti-Poverty strategy. It should also include a strategy for workforce recruitment, upskilling and retention to deliver work under the Fuel Poverty Strategy such as 'whole of house' retrofitting, as part of NI's legal obligation to deliver a just transition.

We recommend the consultation and collaboration with relevant anti-poverty, housing, Traveller, Disabled People's Organisations, health, community, social justice and human rights bodies, and to provide seats for such bodies on the Energy Poverty Advisory Group, to ensure the Strategy is fully poverty and equality proofed.

Effective monitoring and accountability are essential to track progress and make course corrections, and for citizens and communities to hold the government accountable to its obligations on energy poverty. The Strategy must include specific targets for groups at highest risk of energy poverty, including groups at high risk but currently under-represented in official statistics such as members of the Traveller community.' Clear monitoring and accountability mechanisms that are measurable, actionable, and time-bound are essential to policy coherence and protecting citizens' rights under the Aarhus Convention.

If you have any further comments or suggestions not already captured, please provide in the box below.

A just transition is often defined as one which includes decent work for all, social inclusion and the eradication of poverty. Northern Ireland faces a significant challenge to decarbonise its economy and society. While the obligation to reduce carbon emissions is a shared one, the capacity to bear the brunt of such a large-scale transition is unequal.

Northern Ireland's government committed to ensuring a just transition and achieving net zero by 2050. Energy service provision acts as a significant driver of energy demand and associated carbon emissions - the UK housing stock accounts for 27% of national energy demand, with 80% due to heating. Taking steps to change the way in which we heat our homes and buildings is an essential part of NI's emission reduction efforts. The lack of implementation of the Climate Act including setting carbon budgets (despite being two thirds of the way through the second year) and the failure to establish a Just Transition Commission and Climate Commissioner, seriously hinders cross-departmental collaboration to address a range of issues including the high levels of fuel poverty and inadequate housing across NI. Without a national climate action plan - we lack data on building sector emissions and emissions target reductions for that sector. Since transitioning towards renewable energy and away from fossil fuels is key to achieving Northern Ireland's climate goal of reaching net zero emissions by 2050, renewable energy must be made more affordable and attractive to encourage people to choose renewable energy sources for heating, fuel, and electricity over fossil fuels.

This consultation was very broad and covered numerous aspects of the design and implementation of the Fuel Poverty Strategy. It is important to consult on several aspects separately for e.g. (1) engagement, public participation and buy-in, (2) financing energy efficiency measures (3) decarbonisation measures etc.

Addressing energy poverty requires a robust and effective all-of-government approach. It is unlikely, for example, that issues of energy poverty in private rented accommodation will be adequately addressed by a stand-alone energy poverty policy. Equally, issues more directly connected to private rental property standards cannot be addressed without reference to an energy poverty policy. Energy policy, therefore, must become an integral part of policies relating to housing, social care support, healthcare and, importantly, income (in relation to both social welfare and living wage policies). The commitment and participation of all government departments and agencies in delivering on energy poverty is vital. Research, analysis and innovation should be an integral part of implementation, as should continuing and stronger cooperation and partnership with organisations and agencies that are closest to disadvantaged sections of the population.

Thanks to Unite the Union Retired Members Branch for sharing their consultation with us to ensure we incorporated the interests of retired workers and older people within our consultation response.